

# **EXHIBIT E**

<b>CHARGE OF DISCRIMINATION</b>		AGENCY		CHARGE NUMBER
This form is collected by the Privacy Act of 1974. See Privacy Act Statement before completing this form.		<input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC		
(N/A)		and EEOC		
State or local Agency, if any				
NAME (Indicate Mr., Ms., Mrs.) Karen Cabrini Bellifemine; c/o Grant Morris; c/o David Sanford		HOME TELEPHONE (Include Area Code)		
STREET ADDRESS		CITY, STATE, AND ZIP CODE		DATE OF BIRTH
c/o Sanford, Wittels, and Heister, LLP, 2121 K Street N.W., Suite 200, Washington, D.C. 20037;				
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)				
NAME Sanofi-Aventis		NUMBER OF EMPLOYEES, MEMBERS > 50		TELEPHONE (Include Area Code)
STREET ADDRESS (where claimant worked) 300 Somerset Corporate Blvd.		CITY, STATE AND ZIP CODE Bridgewater, NJ 08807		COUNTY Somerset
NAME Sanofi-Aventis, Inc.		TELEPHONE NUMBER (Include Area Code) (212) 551-4000		
STREET ADDRESS (where charge to be served, if different than above) 90 Park Ave.		CITY, STATE AND ZIP CODE New York, NY 10016		COUNTY New York City
CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))				DATE DISCRIMINATION TOOK PLACE EARLIEST (ADRA/EPA)      LATEST (ALL)
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> AGE <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> DISABILITY <input type="checkbox"/> OTHER (Specify)				July 1995      Present <input checked="" type="checkbox"/> CONTINUING ACTION
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): [Please see attached sheets]				
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY (When necessary for State and Local Requirements)		
I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.		SIGNATURE OF COMPLAINANT		
I declare under penalty of perjury that the foregoing is true and correct. 3/8/06 Date		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (Day, month, and year)		

BEL 00653

**EEOC Charge of Discrimination**  
**Karen Bellifemine**  
**March 7, 2006**

**I. Overview of Individual and Class Allegations**

In the course of my employment, Sanofi-Aventis, Inc. ("Sanofi") has discriminated against me in the terms and conditions of my employment on the basis of my gender, female, by subjecting me to disparate terms and conditions of employment, denial of promotional opportunities and a hostile, threatening work environment towards females. I believe that Sanofi's actions are part of a continuing pattern and practice of discrimination against female employees, including, but not limited to, subjecting female employees to disparate terms and conditions of employment, a hostile work environment and other forms of discrimination.

**II. Employment History**

I began my employment with Sanofi as a Primary Care Representative approximately in July 1995. During my time at Sanofi, my job positions were Senior Sale Representative, Hospital Sales Representative, and Senior Specialty Sales Representative. On February 27, 2006, however, I was issued a 30-day warning letter.

**III. Statement of Facts**

In the course of my employment, Sanofi has subjected me to discrimination in employment based on my gender by subjecting me to disparate terms and conditions of employment and other forms of discrimination by my manager, Jeff Kotkin.

The harassment towards me began approximately in January 2005 when my current District Sales Manager, Jeff Kotkin, lost his temper and tried to force me to admit to false accusations about my expense reports. Another time, he bullied me in an angry and vituperative manner until I began to cry. His behavior was most objectionable on days when we worked together one-on-one in a car visiting various doctors' offices. One time, Kotkin claimed I had lied to him about doctors' hours. On another occasion, Mr. Kotkin lost his temper and told our team, as witnessed by nine employees present, that he defaced his room because no one on his team had won an award.

In April 2005, two males employees, Keith LeSueur and Oscar Velez, received higher raises (approximately 5% total raise), while I received a 3% raise from Mr. Kotkin. I did not have access to their exact sales figures or percent salary increase, but based on what I have heard from other sales teammates reporting to Mr. Kotkin, my sales results were better than those of the two male employees.

In approximately May 2005, I applied for a promotion as a Hospital Sales

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Initials *[Signature]*

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Representative for open hospital territories in Hackensack, NJ, Teaneck, NJ and Englewood, NJ areas. I was denied the positions and positions were given to male employees. Two males currently assigned to these hospital areas are Dominick Miglizza and Daryl Macollaro.

On June 9, 2005, I reported Mr. Kotkin to Human Resources. Kotkin had taken sample documents from my possession. These documents are required by federal law when providing physicians with prescription pharmaceutical samples. To obtain these documents, Mr. Kotkin demanded that I drive to my home with him in the car. When I brought the documents from my home to my car, he took the documents and then stated he was "building a case against me". On June 9 and 10, 2005, I documented the occurrences in emails. I gave the emails to Kevin Phox in Human Resources. I then requested a transfer to another position. On July 11, 2005, the request was denied by the Regional Director, Paul Spence. I reported the harassment and hostile work environment twice in the past nine months to Human Resources at Sanofi-Aventis.

During the same month, Mr. Kotkin was reprimanded by his manager and was forced to apologize to the entire sales district, which was comprised of approximately eight employees. This took place after other female employees and I complained of the harassment to Human Resources. Mr. Kotkin's public apology occurred on July 7, 2005 at the Saddlebrook Marriott in Saddlebrook, NJ. After the apology, Mr. Kotkin temporarily halted his abusive behavior towards women.

From October 2005 to December 2005, I contacted the Sanofi Training Department and requested to participate in an in-house preceptorship training to become a sales trainer. The training forum is called Sanofi City where experienced sales representatives work with newly hired sales representatives in the corporate training facility in Bridgewater, NJ. Mr. Kotkin responded by strongly discouraging me from pursuing my interest in the new position. He also directed me to not contact anyone in the sales training department and told me that any further contact would result in "serious consequences". Finally, he directed me later in the week to copy him on any emails and voice mails I send to any Sanofi-Aventis employees.

In December 2005, Mr. Kotkin falsely accused me of having poor relationships with certain customers and poor communication skills. On January 8, 2006, I sent an email to Kevin Phox in Human Resources to report that Mr. Kotkin had retaliated against me for reporting him several times to Human Resources. I explained to Mr. Phox that Mr. Kotkin had documented his accusations against me in a memo titled "12-21 1-on-1 Meeting Follow-up". The memo was dated December 22, 2005. Mr. Phox did not reply by email but we discussed the topic of retaliation by phone in mid-January 2006. We also discussed the similarities of Mr. Kotkin's memo to a guised development plan designed to retaliate against me. Later, we discussed the similarities of the development plan to the punishment the company inflicted on Mr. Kotkin in July 2005 following his apology to the sales district. After my discussion with Mr. Phox, a "360 evaluation" was never conducted on me.

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Initials *KB*

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On February 22, 2006, I notified Human Resources, by email and made another complaint against Mr. Kotkin for harassment, hostile environment, and retaliation which included the false accusations he made against me, thus harming my reputation at work.

**IV. Discrimination Claims**

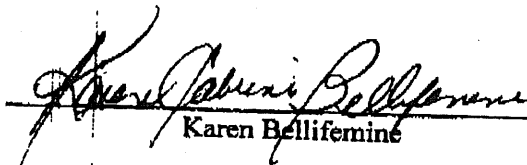
I believe that Sanofi has discriminated against me in the terms and conditions of my employment on the basis of gender, by denying me promotions in favor of less senior, less qualified male employees and subjecting me to disparate terms and conditions of employment, a hostile work environment and other forms of discrimination.

**V. Class Claims**

Based on my observations and experience, I believe that Sanofi has engaged and continues to engage in a pattern and practice of discrimination against its female employees and denies them equal employment opportunities in ways including, but not limited to, the following: denying female employees promotions in favor of less senior, less qualified male employees and subjecting female employees to disparate terms and conditions of employment, a hostile work environment and other forms of discrimination. I believe that these discriminatory patterns and practices occur throughout Sanofi. I make this charge on behalf of all similarly situated female employees and myself.

I declare under penalty of perjury that the foregoing is true and correct.

March 8, 2006

  
Karen Bellifemine

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Initial 

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